

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LOYALTY CONVERSION SYSTEMS
CORPORATION

Plaintiff,

v.

AMERICAN AIRLINES, INC., ET AL.

Defendants.

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Case No. 2:13-CV-655-JRG
(LEAD CASE)

Jury Trial Demanded

UNOPPOSED MOTION TO EXTEND CERTAIN DEADLINES
RELATING TO DISCLOSURES UNDER P.R. 4-2

Plaintiff Loyalty Conversion Systems Corporation (“Loyalty Conversion”), hereby submits this Unopposed Motion to Extend Certain Deadlines Relating to Disclosures under P.R. 4-2. Pursuant to the Court’s Docket Control Order (Doc. No. 40) the current deadline to comply with P.R. 4-2 is May 15, 2014. Plaintiff respectfully requests that the parties’ deadline for P.R. 4-2 disclosures be extended by one week up to and including May 22, 2014. The parties have conferred and Defendants do not oppose this request.

A Proposed Amended Docket Control Order attached as Exhibit A for the Court’s consideration.

Dated: May 15, 2014

Respectfully submitted,

By: /s/ Andrew G. DiNovo

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h), and that Defendants are unopposed to the foregoing motion.

/s/ John D. Saba

John D. Saba

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel, who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 15th day of May 2014.

/s/ Andrew G. DiNovo

Andrew G. DiNovo